

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

<b>SABRINA F. WILLIAMS,</b>	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 3:19-CV-0694</b>
	)	<b>Judge Crenshaw</b>
<b>STATE OF TENNESSEE,</b>	)	<b>Magistrate Judge Holmes</b>
<b>OFFICE OF THE COMPTROLLER OF</b>	)	
<b>THE TREASURY, and JUSTIN WILSON,</b>	)	<b>Jury Demand</b>
<b>in his official capacity as</b>	)	
<b>Comptroller of the Treasury,</b>	)	
<b>Defendants.</b>	)	

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**PLAINTIFF’S MOTION TO EXTEND TIME TO FILE RESPONSE TO  
DEFENDANT’S MOTION TO DISMISS**

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COMES NOW Plaintiff Sabrina Williams, by and through the undersigned counsel, and submits this Motion to Extend Time to File a Response to Defendant’s Motion to Dismiss, and in support thereof, Plaintiff states as follows:

1. On February 13, 2020, Defendants filed a Motion to Dismiss for Lack of Jurisdiction.
2. Plaintiff’s Response to the Motion to Dismiss for Lack of Jurisdiction is due on February 27, 2020.
3. On February 26, 2020, counsel for Plaintiff had a death in his immediate family.
4. Counsel for Plaintiff, upon realizing that there would be a delay in the ability to file a Response to the Motion to Dismiss for Lack for Jurisdiction, immediately contacted counsel for Defendants to confer about an extension of time to file the Response.

5. Counsel for Defendant agreed to an extension of time, until March 5, 2020, to file the Response to the Motion to Dismiss for Lack of Jurisdiction.

6. This Motion is timely, and not brought for purposes of delay.

7. The extension of time, until March 5, 2020, to file the Response to the Motion to Dismiss will not cause any undue delay or change any other deadlines in this case.

WHEREFORE, in light of the foregoing stated facts, Plaintiff respectfully requests the Court extend until March 5, 2020, the deadline to for Plaintiff to file a Response to the Motion to Dismiss for Lack of Jurisdiction.

Respectfully submitted,

/s/ PHILLIS h. RAMBSY  
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**Certificate of Service**

The undersigned hereby certifies that on this the 27<sup>th</sup> day of February 2020, a true and correct copy of the foregoing Motion to Extend Time to Respond to the Motion to Dismiss was filed electronically, and a copy sent via the court's electronic filing system to:

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/s/ Phillis h. Rambsy  
Phillis h. Rambsy